

UNITED STATES DISTRICT COURT
Concord, NH

District of Merrimack NH

Docket # 17-CV-733

Natasha DeLima et Al
Plaintiff

v.

YouTube, Et Al
Defendants

Plaintiff's Motion Discovery Rule 26, Duty To Disclose

Now comes the Plaintiff in the above entitled matter and does seek discovery from the Defendants who are now being served. First request for discovery, it is possible the Plaintiff will need more

All Defendants must provide the following (what is related to each defendant)

1. All IP Addresses that have visited the Plaintiff's web site addresses since the day the Plaintiff opened up a channel, blog, page, account, site, etc. Every single IP address must be proved.
2. All earnings paid to the Plaintiff by date since the beginning of time when the sites Patreon, and YouTube made money from the Plaintiff's accounts on those web sites
3. GoFundMe must provide all addresses and all payments that they reported did not go through.
4. All Defendants must provide all tweets, emails, copies of all correspondence they received from the Plaintiff, including the Petition.
5. All parties must submit any responses they made to the Plaintiff in any form.
6. YouTube & Patreon must provide IP addresses for The Truth Factory Cat, Anti-School, Destroying the Illusion, MLordandGod, AprilLaJune, on YouTube and in Patreon, and the payments paid to that account in both websites.
7. YouTube must list the amount of channels closed in 2018, names of channels and reasons they were closed.

8. YouTube must list their criteria for giving strikes, community guidelines, copyright, etc.
9. YouTube must give list of Plaintiff's "violations" on her account
10. YouTube must submit monetization prices per video, per view, and all ways in which channel subscribers are paid.
11. YouTube must list their signing up policy
12. YouTube must list their monetization policy and any changes since 2012
13. YouTube must provide all IP addresses to the Plaintiff's main channel, <https://www.youtube.com/user/Natasha78d>
14. and her 2nd channel <https://www.youtube.com/channel/UCUImdIE04AewC-lvBFrgJDw>
15. YouTube must provide IP addresses and monetization payouts for the 2nd channel, and # of views and subscribers
16. Twitter must provide IP addresses for @LifecoachNV16, @Loveeveryone88, @Natasha78d, @Armando15artist and provide the number of tweets and analytics
17. Patreon must provide all Patreons, their payments to the Plaintiff, and all declines
18. Patreon must provide site criteria, and a list of every single notification to the Plaintiff's account, total payments, any correspondence to the Plaintiff
19. GoFundMe must list the number of fundraisers that people have to cover legal fees, emergencies, they must disclose how many fund raisers they have closed on people and why, reason for closing AntiSchool campaign, they must disclose why they closed the Plaintiff's campaign and all correspondence
20. Facebook must disclose the Plaintiff's security issues, since the account was opened. Facebook must disclose the IP addresses into the Plaintiff's Stop Bullying and Protect All Children page, Facebook must disclose all removed links or postings from the Plaintiff's account, Facebook must disclose how many times they closed the Plaintiff's account
21. YouTube must disclose all comments to each video that the Plaintiff has, and all deleted comments. YouTube must disclose all deleted videos. YouTube must

disclose all videos they flag for non- monetization. YouTube must disclose all videos that were found "not able to be monetized. YouTube must provide site reason for these videos being stolen as they are the Plaintiff's virtual property,

22. YouTube must submit the Subscription total, viewership total, and payment earnings as well as IP addresses for the following similar websites

MLordandGod

AntiSchool

Destroying the Illusion

True Lies

April LaJune

YouAreFreeTv

ISAAC GREEN

A handwritten signature in blue ink, appearing to read "Isaac Green", written in a cursive style.

UNITED STATES DISTRICT COURT
Concord, NH

District of Merrimack NH

Docket # 17-CV-733

Natasha DeLima et Al
Ashley Roberson
Isaac Green
Plaintiffs

v.

YouTube, Et Al
Defendants

Plaintiff's Motion Discovery Rule 26, Duty To Disclose

Now comes the Plaintiff in the above entitled matter and does seek discovery from the Defendants who are now being served. First request for discovery, it is possible the Plaintiff will need more

All Defendants must provide the following (what is related to each defendant)

1. All IP Addresses that have visited the Plaintiffs web site addresses since the day the Plaintiff opened up a channel, blog, page, account, site, etc. Every single IP address must be proved.
2. All earnings paid to the Plaintiffs by date since the beginning of time when the sites Patreon, and YouTube made money from the Plaintiff's accounts on those web sites
3. GoFundMe must provide all addresses and all payments that they reported did not go through for all Plaintiffs in this case
4. All Defendants must provide all tweets, emails, copies of all correspondence they received from the Plaintiff, including the Petition.
5. All parties must submit any responses they made to the Plaintiffs in any form.
6. YouTube & Patreon must provide IP addresses for The Truth Factory Cat, Anti-School, Destroying the Illusion, MLordandGod, AprilLaJune, on YouTube and in Patreon, and the payments paid to that account in both websites.

7. YouTube must list the amount of channels closed in 2018, names of channels and reasons they were closed.
8. YouTube must list their criteria for giving strikes, community guidelines, copyright, etc.
9. YouTube must give list of Plaintiffs "violations" on all Plaintiffs accounts
10. YouTube must submit monetization prices per video, per view, and all ways in which channel subscribers are paid. YouTube must submit monetization for any additional channels that each channel owner has. YouTube must give reasons for failing to monetize any and all channels that the Plaintiffs own.
11. YouTube must list their signing up policy, their fair use language, their community strikes language in their policy, their copyright infringement police. They need to list how many people got either or both in 2017, 2018 that own YouTube channels.
12. YouTube must list their monetization policy and any changes since 2012
13. YouTube must provide all IP addresses that visited the Plaintiff's main channel, <https://www.youtube.com/user/Natasha78d>
14. and her 2nd channel <https://www.youtube.com/channel/UCUImdIE04AewC-lvBFrgJDw> since day one
15. YouTube must list the IP addresses that visited AntiSchool, and Marxx Channel and explain why those channels are denied monetization.
16. YouTube must provide IP addresses and monetization payouts for the 2nd channel, and # of views and subscribers
17. Twitter must provide IP addresses for people that tweeted posts from @LifecoachNV16, @Loveeveryone88, @Natasha78d, @Armando15artist and provide the number of tweets and analytics @AntiSchool @DestroyingTheIllusion,
18. Patreon must provide all Patreons, their payments to the Plaintiff, and all declines

19. Patreon must provide site criteria, and a list of every single notification to the Plaintiff's account, total payments, any correspondence to the Plaintiff
20. GoFundMe must list the number of fundraisers that people have to cover legal fees, emergencies, they must disclose how many fund raisers they have closed on people and why, reason for closing AntiSchool campaign, they must disclose why they closed the Plaintiff's campaign and all correspondence
21. Facebook must disclose all of each Plaintiff's security issues, since their accounts were opened. Facebook must disclose the IP addresses into the Plaintiff's Stop Bullying and Protect All Children page, Facebook must disclose all removed links or postings from the Plaintiff's account, Facebook must disclose how many times they closed the Plaintiff's account. Facebook must disclose all the same data for Anti School.
22. YouTube must disclose all comments to each video that the Plaintiff has, and all deleted comments. YouTube must disclose all deleted videos. YouTube must disclose all videos they flag for non- monetization. YouTube must disclose all videos that were found "not able to be monetized. YouTube must provide site reason for these videos being stolen as they are the Plaintiff's virtual property,
23. Google must provide all IP addresses into the Plaintiff's Blog Website, and all analytics Google must disclose the hidden posts that the Plaintiff has posted to Google and explain the language why they are "hidden" in search bars. Google needs to explain why they have purposely posted a false narrative on the Plaintiff, and keep it on the first page of her name search on the internet.
24. YouTube must submit the Subscription total, viewership total, and payment earnings as well as IP addresses for the following similar websites

MLordandGod
AntiSchool
Destroying the Illusion
True Lies
April LaJune
YouAreFreeTv

Additional discovery requests will follow.

A handwritten signature in black ink, appearing to be 'OK MJD' followed by a long horizontal line.